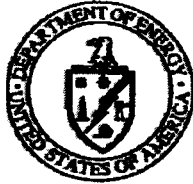


CORRES. CONTROL
INCOMING LTR NO

00639 RF 99

DUE DATE
ACTION

Department of Energy

ROCKY FLATS FIELD OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

JUN 16 1999

99-DOE-01871

Mr Steve Gunderson
RFCA Project Coordinator
Colorado Department of Public Health and Environment
Hazardous Materials and Waste Management Division
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Dear Mr. Gunderson

Please find enclosed a copy of two proposed modifications to the Decommissioning Program Plan (DPP) The modifications are also being sent for approval to the RFCA Project Coordinators for the U S. Environmental Protection Agency.

These modifications are the two that were proposed by the U.S. Department of Energy, Rocky Flats Field Office by letter dated January 6, 1999 (98-DOE-01199). The modifications will revise sections 1.1.1, 1.1.5 and add a new section 1.1.6 When approved, they will 1) help resolve issues relating to communications and the regulatory process, and 2) facilitate removal of certain fixed equipment or systems.

Following your response to the referenced letter in which you stated the proposed modification met the criterion for being a "major modification," the modification was sent out for a 45-day public comment period. No public comments were received, so the modifications are being submitted to you for approval as drafted.

Thank you for your consideration of this matter. If you have any questions regarding the modification, please call Matthew McCormick at (303) 966-4776 or Fred Gerdeman at (303) 966-6203

Sincerely,

Joseph A. Legare
Assistant Manager
for Environment and Infrastructure



ADMIN RECCRD
9W-A-003296

DIST.	LTR	ENC
BENSUSSEN, S.J.		
BOGEMBERGER, V		
BRALSFORD, M.D.		
CARD, R.G.		
COSGROVE, M.M.		
COX, C.M.		
CRAWFORD, A.C.		
DEJONG, V.J.		
DERBY, S.		
DIETERLE, S.E.		
FERRERA, D.W.		
FERRERA, K.P.		
FILTON, J.C.		
GERMAN, A.L.		
HARDING, W.A.		
HARROUN, W.P.		
HEDAH, T.G.		
LEONARD, R.C.		
LEWIS, M.R.		
MARTINEZ, L.A.		
NORTH, K.		
PARKER, A.M.	X	X
PHILLIPS, F.J.	X	X
POLSTON, S.		
RODGERS, A.D.		
SANDLIN, N.B.		
SHELTON, D.C.	X	X
SPEARS, M.		
TUOR, N.R.		
VOORHEIS, G.M.		
WARTHER, R.F.		
Mathis, B.	X	X
Steward, J.	X	X
Brookhart, J.	X	X

COR. CONTROL	X	X
ADMIN. RECORD		
PATS/T130G		

Reviewed for Addressee
Corres. Control RFP

6/17/99 *[Signature]*
Date By

Ref Ltr. #

Enclosures

DOE ORDER # *None*



Department of Energy

ROCKY FLATS FIELD OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

JUN 16 1999

99-DOE-01871

Mr. Tim Rehder
U.S. Environmental Protection Agency
Region VIII
Attn: Rocky Flats Project Manager 8EPR-FT
999 18th Street, Suite 500, 8WM-C
Denver, Colorado 80202-2405

Dear Mr. Rehder:

Please find enclosed a copy of two proposed modifications to the Decommissioning Program Plan (DPP). The modifications are also being sent for approval to the RFCA Project Coordinator for the Colorado Department of Public Health and Environment.

These modifications are the two that were proposed by the U.S. Department of Energy, Rocky Flats Field Office in the letter dated January 6, 1999 (98-DOE-01199). The modifications will revise sections 1.1.1, 1.1.5 and add a new section 1.1.6. When approved, they will 1) help resolve issues relating to communications and the regulatory process, and 2) facilitate removal of certain fixed equipment or systems.

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Thank you for your consideration of this matter. If you have any questions regarding the modification, please call Matthew McCormick at (303) 966-4776 or Fred Gerdeman at (303) 966-6203.

Sincerely,

Joseph A. Legare
Assistant Manager
for Environment and Infrastructure

Enclosures

cc (w/Enclosures):

J Roberson, OOM, RFFO
D Lowe, Acting DMTP, RFFO
H. Dalton, AMFD, RFFO
P. Golan, AM CPM
M. McCormick, FC, RFFO
R. DiSalvo, OCC, RFFO
J Rampe, EI, RFFO
T Rehder, USEPA
A. Parker, K-H
D Shelton, K-H
B. Mathis, K-H
J Stevens, K-H
L. Brooks, K-H
F. Phillips, K-H

To capture the discussions regarding notifying the regulators of D&D activities, DOE proposes the following be added to Section 1.1.1 of the DPP, entitled "Working Relationships". The following wording (in bold) would be inserted in the existing paragraph entitled "Timely sharing of information":

1) Timely sharing of information – All parties will use their best effort to share project and program information in a timely manner. DOE will inform the regulators on an ongoing basis of building disposition activities sitewide, including decommissioning and pre-decommissioning activities. Information sharing efforts may include but need not be limited to: updates of the overall Site closure baseline, briefings on the development of annual work plans and budgets, briefings on changes to approved baselines affecting building disposition activities, invitations to attend project status briefings, and consultations on decommissioning strategy. DOE will notify CDPHE and EPA in writing at the start of each fiscal year of those buildings in which DOE intends to conduct decommissioning activities. If DOE intends to perform decommissioning in additional buildings during the year, it will notify CDPHE and EPA in writing of those additional buildings. CDPHE and EPA recognize their responsibility to provide timely comments on decision documents and other documents for which their comments have been requested, and agree to raise concerns regarding the Site building disposition program and projects in a timely manner. DOE will share decommissioning project-related information in a timely manner with the LRA's project points of contact. This project-related information may include written information that the DOE and LRA project points of contact agree is relevant to the ongoing regulatory oversight of the project, such as IWCP's, site procedures, data, etc. DOE will also use good faith efforts to ensure that the LRA points of contact are aware of significant project meetings, including management reviews, which will be open to LRA representatives. The LRA point of contact may provide DOE with comments regarding project planning and execution. CDPHE and EPA recognize that decommissioning projects will proceed as scheduled, whether or not the LRA point of contact has taken the opportunity to attend meetings or read the written information provided.

1.1.5. Removal of Certain Fixed Equipment or Systems under the DPP

This section describes the removal of certain fixed equipment and systems from Type 1, 2, and 3 buildings undergoing the disposition process. Fixed equipment or systems removal conforming with this section reflects agreement that no other RFCA decision document or RFCA decision as described in Section 1.1.4. and Figure 1.1-1 is needed for this work. However, DOE and the LRA, will continue the consultative process regarding the removal of fixed equipment from buildings. The purpose of removing fixed equipment and systems as described in this section is to facilitate performance of the reconnaissance level characterization survey, to promote the timely disposition of excess useable equipment or the disposition of waste and to use available building manpower in an efficient manner.

For the purposes of this section, fixed equipment and systems means those items that are attached to the floor or walls or ceiling of a building, but which are not connected to building systems, such as plumbing or ventilation, that could reasonably be expected to provide a pathway for contaminants to reach the environment. Fixed equipment may be connected to utilities that do not provide such a pathway, such as electrical or telephone systems. As examples, fixed equipment includes machinery that is bolted or otherwise attached to floors or walls, cabinets, lockers, benches and electrical panels. Fixed equipment under this section also includes items such as hoods, gloveboxes and tanks that may have been attached to the building but never connected to building ventilation or plumbing systems. On a case-by-case basis, fixed equipment that is connected to building systems may be removed pursuant to this section of the DPP, with the agreement of the parties. Otherwise, the need for a RFCA decision or decision document for systems that have been connected, but which are uncontaminated, and for attached equipment inside of gloveboxes will be determined per Section 1.1.4.

Pursuant to this section, DOE may remove fixed equipment and systems as defined herein, regardless whether or not such equipment is contaminated with radiological or hazardous substances.

DOE shall follow a removal process for fixed equipment and systems that ensures that such material is appropriately described, characterized and dispositioned. The fixed equipment and systems removal process will consist of the following documented steps:

- 1) A preliminary radiological/hazardous substance evaluation, taking into account such factors as the operating history of the equipment and the area or building in which the equipment is located, will determine the need to perform additional characterization of the equipment.
- 2) If indicated by the preliminary radiological/hazardous substance evaluation, a radiological survey and /or hazardous substance characterization will be performed to determine if the equipment fits the criterion for free release.

- 3) If the equipment is to be dispositioned as waste, the characterization is properly performed to ensure conformance with the waste acceptance criteria for storage and/or disposal.
- 4) Removal of fixed equipment will be in accordance with Site radiological, hazardous substance and hazardous waste control procedures to control contamination-

(The decision to re-use fixed equipment and systems, as defined in this section, either on-site or elsewhere, is solely DOE's. Removal of fixed equipment for re-use on-site or elsewhere in the DOE complex is mission-related work not subject to regulation under this DPP.)

By implementing the process outlined above, DOE will ensure that fixed equipment will be characterized and dispositioned appropriately. Equipment containing greater than the free release limits of radionuclides or other hazardous substances will not be shipped to a sanitary landfill, nor released for unrestricted public use.

DOE will ensure that site procedures are developed and maintained to govern the characterization and removal of fixed equipment. In general, the following documents establish the procedures or conditions under which the removal of fixed equipment takes place.

- Health and Safety Procedure 18.10 governs the characterization and release of property and waste.
- The Site Integrated Work Control Program Manual governs work planning and hazards analysis and work package development process.
- The Site Radiological Safety Practices Manual establishes methods for the control of radioactive contamination.
- The Site transportation manuals establish the procedures for packaging and shipment of equipment and waste.
- Individual authorization basis documents (such as Safety Analysis Reports) establish the safety envelopes for individual buildings.

DOE will make these and other Site procedures available to the LRA. These documents are not, however, subject to LRA approval.

Per Section 1.1.1 of this DPP, DOE, CDPHE and EPA encourage and expect an open dialogue among regulator, DOE and contractor project points of contact regarding the removal of fixed equipment, and will use the RFCA consultative process to share project information on an ongoing basis. DOE will make available to the LRA on request any and all documentation relating to the characterization and removal of fixed equipment and systems, subject to classification requirements. Key meetings and evolutions will be open to LRA representatives. If management reviews are performed prior to the removal of fixed equipment, the LRA will be given the opportunity to attend these reviews

NOTE: To accommodate this proposed new section to the DPP, and to make it consistent with existing language regarding equipment removal without a decision

document, the following language is proposed as a parenthetical, to be added to the end of the second paragraph of Section 1.1.4, at line 314.

(This section of the DPP governs fixed equipment such as gloveboxes that are connected to building systems such as ventilation or plumbing, but which DOE believes are not contaminated. Section 1.1.5, below, governs fixed equipment, such as machinery, that is not connected to building systems such as ventilation or plumbing, and to equipment such as gloveboxes or tanks that have never been connected to building systems such as gloveboxes or plumbing.)

Additionally, existing DPP section 1.1.5 will be renumbered as section 1.1.6.